REMARKS

Claims 1-33 are now pending. By this Amendment, claims 1-3, 5, 6, 9-12, and 15-29 are amended and new claims 32 and 33 are added. Applicants have amended the specification and claims to correct various informalities discovered therein and to otherwise improve clarity.

Rejections Based Upon Informalities

Claims 1-31 are objected to because of various informalities. Applicants thank the Examiner for suggesting corrections to the claims, and Applicants have for the most part incorporated such suggestions into the amended claims. Accordingly, Applicants respectfully submit that this objection is now moot.

However, the Office Action suggests that with regard to claim 20, a Markush group should be used instead of the term "transmission control protocol/internet protocol." Applicants respectfully submit that the term "transmission control protocol/internet protocol," which is otherwise known as TCP/IP, is a well-known single technical term referring to a family of Internet protocols, and thus would be improper if rewritten as a Markush group. *See, e.g.,* Newton's Telecom Dictionary, 14th ed., pp. 745-746 (attached), and specification, p. 28, lns. 7-9.

Art-Based Rejection

Turning to the substance of the Office Action, claims 19-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,219,708 to Martenson ("Martenson"). In order to reject a claim as obvious under § 103(a), three criteria must exist: 1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference

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teachings; 2) there must be a reasonable expectation of success; and 3) the prior art reference(s) must teach or suggest all the claim limitations. *See* MPEP § 706.02 (j); *In re Vaeck*, 947 F.2d 488 (Fed. Cir. 1991).
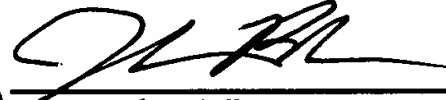
Applicants respectfully submit that Martenson does not teach or suggest all the claim limitations, and the level of knowledge of one of ordinary skill in the art does not cure this deficiency. More specifically, currently amended claim 19 recites, *inter alia*, a "nonvolatile semiconductor memory package comprising . . .a memory device . . . a control portion . . . a network interface . . . a file management portion . . . and a memory interface." Martenson, however, does not teach or suggest that the memory device, control portion, network interface, file management portion, and memory interface are all within a semiconductor memory package. At most, Martenson teaches a system for network resource management by using a "card" or "board" containing discrete components such as "8MB of SIMMs memory" and "Flash proms." (See col. 1, lns. 63-64, col. 5, lns. 23, 29-31, and Fig. 3 ("on board memory")). Further, it would not be feasible, and therefore not obvious, to combine each of the discrete Martenson components into a semiconductor memory package because the microelectronic components must be designed in tandem with the semiconductor package. Because Martenson does teach or suggest semiconductor packaging, amended claim 19 is allowable over Martenson.

Dependent claims 20-23, which depend from independent claim 19, are allowable for at least the reasons discussed in regard to claim 19 and further in view of the novel features recited therein.

Conclusion

All objections and rejections having been addressed, it is believed that the present application is in condition for allowance, and notification of the same is respectfully requested. Should the Examiner have any questions or believe that an interview would expedite allowance, he is invited to telephone the undersigned at the number listed below. Please charge any fees associated with this paper to our Deposit Account No. 19-0733.

Respectfully submitted,

By: _____ Reg. No. 42,338

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Dated: July 24, 2003